

ORIGINAL

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October 29, 1999

EX PARTE OR LATE FILED

Notice of *Ex Parte* Presentation

Magalie Roman Salas, Esq.  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> St., S.W.  
Washington, D.C. 20554

RECEIVED  
OCT 29 1999  
FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Dear Ms. Salas:

**Re: Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, CC Docket No. 94-102; and Implementation of the Non-Accounting Safeguards of Sections 271 and 272 of the Communications Act of 1934, as amended, CC Docket No. 96-149**

Yesterday, the following parties met with Audrey Wright and David Kirschner of the Common Carrier Bureau of the FCC to discuss issues regarding the above mentioned dockets: Gary Buckwalter, Southwestern Bell Telephone Company (SWBT); Ron Huelsing, Richard Schanen, Barbara Hunt and Christine Jines of SBC; Rob Cohen, and Cindy Clugy of SCC Communications Corp.; James Casserly of Mintz, Levin, Cohn, Ferris, Glovsky and Popeo PC, representing SCC Communications Corp.; Richard Muscat, representing the Commission on State Emergency Service (CSEC) in Texas and the Greater Harris County 911 Emergency Network; Lavern Hogan and John Melcher also representing the Greater Harris County 911 Emergency Network; and Lori Buerger of AT&T Wireless.

The parties presented two diagrams (copies attached). The first diagram depicts the current serving arrangement for 911 service in Texas when that service is provided as a complete service by Southwestern Bell Telephone Co. (SWBT). The second diagram depicts a proposed 911 service arrangement in Texas that accommodates an alternative 911 database provider. The joint position of the parties was that the prior MFJ waivers, the Justice Department letter of March 27, 1991, brought forward by 271(f), and the Forbearance Order covers, not only the existing arrangement, but also the alternative database serving arrangement.

Two issues regarding the diagrams were discussed with the FCC staff. The first issue is that SWBT's 911 tariff is being disaggregated to offer separate rate elements, so that the 911 agencies in Texas can pay for only those elements they desire to secure from SWBT, with the option of securing the remaining elements from competitive providers. The second issue is that the proposed serving arrangement involves SWBT extending existing circuits from the SWBT ALI database to the Alternative ALI database and could include new circuits from the PSAP to the Alternative ALI database. Either or both of those extended or new circuits could cross a LATA boundary, as depicted on the second diagram attached to this letter.

The parties jointly requested the concurrence of Commission staff that the proposed serving arrangement depicted on the second diagram is covered by the MFJ waiver, as interpreted by the Department of Justice by letter dated March 27, 1991, brought forward by 271 (f) of FTA96 and the Commission's Forbearance Order in CC Docket 96-149.

In accordance with the Commissions rules concerning *ex parte* presentations, one copy of this notice is provided. Questions may be referred to the undersigned at 202-326-8879.

Respectfully submitted,

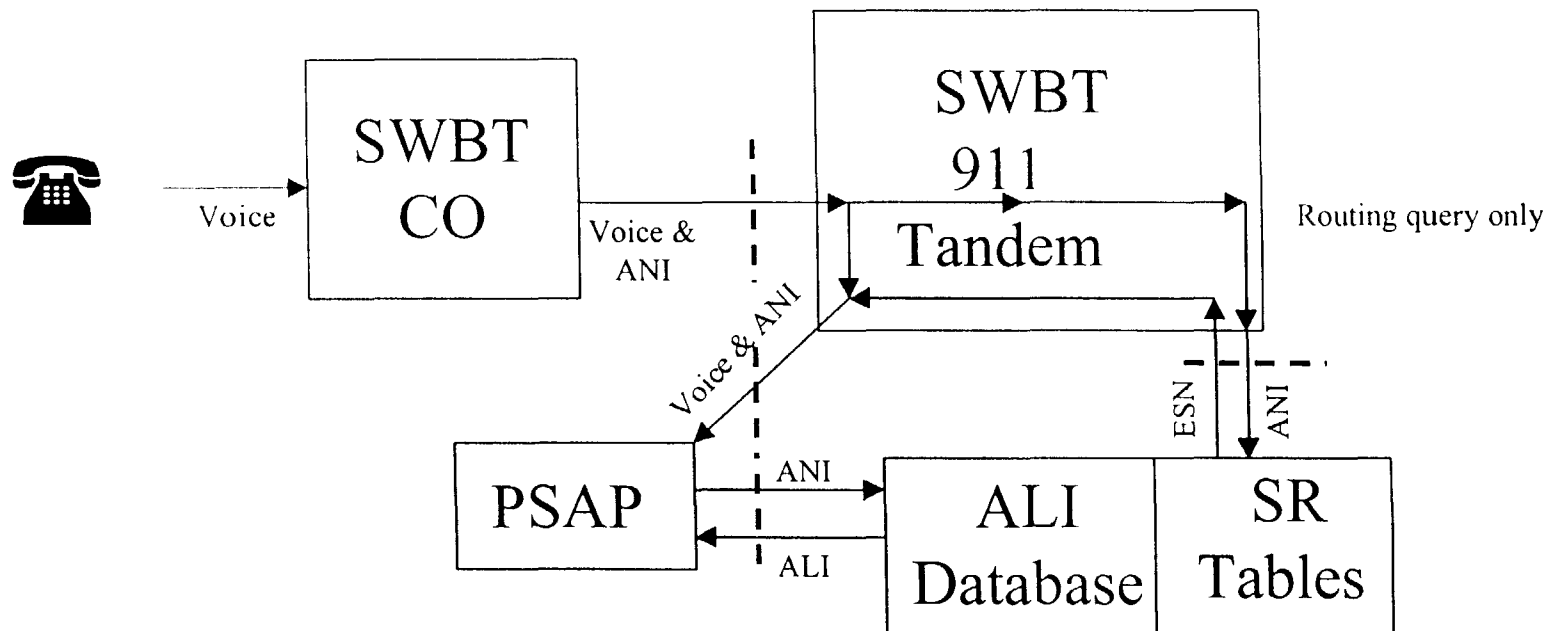
A handwritten signature in cursive script that reads "Chris Jones". The signature is written in black ink and is positioned above the word "Attachments".

Attachments

CC: all parties in attendance

# SWBT E911 SERVICE CONFIGURATION - COVERED BY 271(f)

1



- - - - - potential LATA boundary

ANI - Automatic Number Identification

ESN - Emergency Service Number

ALI - Automatic location information

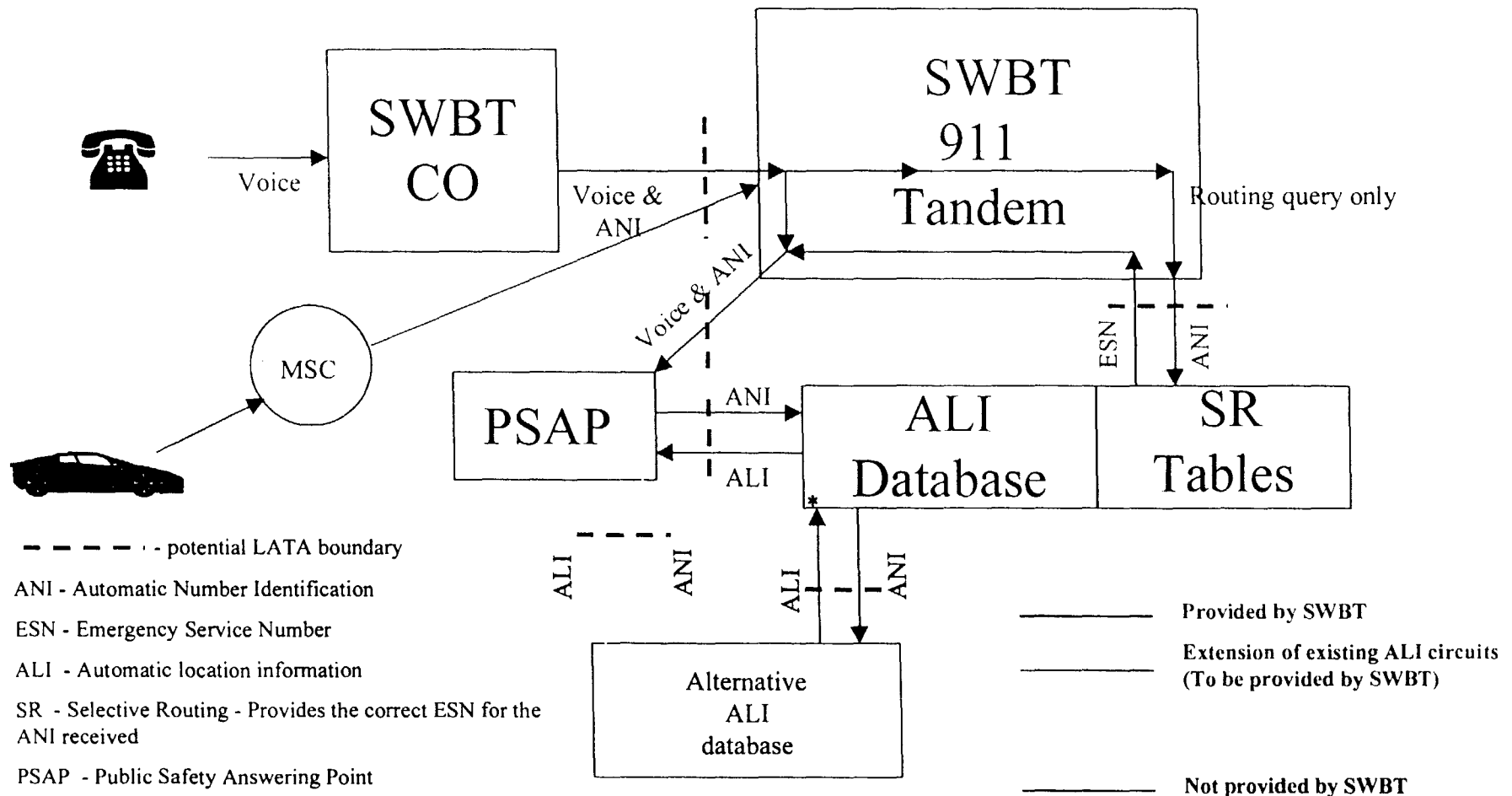
SR - Selective Routing - Provides the correct ESN for the ANI received

PSAP - Public Safety Answering Point

911 Tandem - Selectively routes 911 calls to the PSAP responsible for the caller's location

\_\_\_\_ Provided by SWBT

# PROPOSED 911 ARRANGEMENT WITH ALTERNATIVE DATABASE PROVIDER



\*SWBT ALI database not accessed